

URS OPERATING SERVICES

999 18TH STREET
SUITE 900
DENVER, COLORADO 80202-2409
TEL: (303) 291-8200
FAX: (303) 291-8296

April 25, 2013

Mr. Peter Stevenson
EPA On-Scene Coordinator
U.S. Environmental Protection Agency, Region 8
Mail Code: 8EPR-SA
1595 Wynkoop Street
Denver, Colorado 80202-1129

**SUBJECT: START 3, EPA Region 8, Contract No. EP-W-05-050, TDD No. 1110-10,
Final Clearance Set Report for Removal Action, Eaton Sugar Beet Factory (RV),
Eaton, Weld County, Colorado**

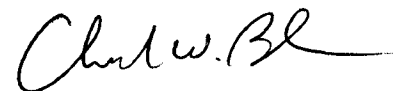
Dear Mr. Stevenson:

Attached is the Final Clearance Set Report for the Eaton Sugar Beet Factory (RV) site in Weld County, Eaton, Colorado. This report includes information regarding the final clearance sets performed by a Colorado Department of Public Health and Environment (CDPHE) certified Air Monitoring Specialist (AMS) for asbestos abatement zones at the Eaton Sugar Beet Factory site from on January 27, 2012 through March 13, 2013. This document is submitted for your review and approval.

If you have any questions, please call me at 303-291-8272

Very truly yours,

URS OPERATING SERVICES, INC.


Jeremiah Ervin
Project Manager

cc: Charles W. Baker/UOS (w/o attachment)
File/UOS

EPA ACTION BLOCK

- ☐ Approved
- ☐ Approved, TDD to follow
- ☐ Approved as corrected
- ☐ Disapproved
- ☐ Review with _____
- ☐ Original to _____
- ☐ Copy to _____
- ☐ Reply envelope enclosed

Date

By

TRIP REPORT

EATON SUGAR BEET FACTORY SITE Eaton, Weld County, Colorado

1.0 INTRODUCTION

URS Operating Services, Inc. (UOS), was tasked by the U.S. Environmental Protection Agency (EPA), under Superfund Technical Assessment and Response Team 3 (START) contract # EP-W-05-050, Technical Direction Document (TDD) No. 1110-10, to provide technical support to a Region 8 On-Scene Coordinator (OSC) and to have final clearance sets performed by a Colorado Department of Public Health and Environment (CDPHE)-certified Air Monitoring Specialist (AMS) for asbestos abatement zones in conjunction with a removal action that took place at the Eaton Sugar Beet Factory (ESBF) site. Final clearance sets consisted of the AMS conducting final visual inspections and final clearance air monitoring and air sample analysis in accordance with CDPHE's Regulation 8 Part B (CR8). The purpose of completing final clearance sets for each asbestos abatement zone was to have visual and analytical confirmation that friable and non-friable asbestos-containing materials (ACMs) had been thoroughly abated so that no asbestos debris or dust was visible in the clearance zone. Five air samples were collected in the zone, which revealed analytical results less than 0.01 fibers per cubic centimeter (f/cc). Field activities followed the CR8, applicable UOS Technical Standard Operating Procedures (TSOPs), the UOS ESBF Field Sampling and Air Monitoring Plan, and the Emergency Response Program Generic Quality Assurance Project Plan (UOS 1999, 2005, 2011).

2.0 BACKGROUND

The EPA has performed remediation work under a removal action at the ESBF site since November 2011. Remedial work has included abatement of friable and non-friable ACM in three buildings (Warehouse, Sugar Beet Factory, and Office) and removal and disposal of containers of hazard classified waste at the ESBF site.

START and EPA conducted a Phase II Targeted Brownfield Assessment (TBA) investigation of the ESBF site in 2010. The Phase II TBA characterized, delineated, and quantified ACM and ACS on site, along with identifying and characterizing hazardous waste chemicals stored in containers in various areas of the ESBF site. The Phase II Analytical Results Report has been the main guidance for removal work conducted during this EPA Removal Action for the ESBF site (UOS 2010).

3.0 FINAL CLEARANCE SET ACTIVITIES

START subcontracted Koch Environmental Health (KEH) who provided the CDPHE-certified AMS. The AMS completed the final clearance set work for the asbestos abatement of three buildings at the ESBF site. Per the Asbestos Abatement Project Design Report and CDPHE Asbestos/Demolition Notification and Permit Modification Form, filled out by the general abatement contractor (GAC) Environmental Restoration, LLC (ER), there were 15 asbestos abatement work zones that had abatement work completed (KEH 2011, ER 2013). The ESBF Site Confirmation final clearance sets were performed to obtain information that was needed to identify whether ACM had been thoroughly abated to CR8 standards in each asbestos abatement work zone.

Once ER performed the abatement and removal, the first phase of each completed final clearance set consisted of the AMS conducting a visual inspection in accordance with CR8 Part B in each asbestos abatement zone. Final visual inspections consisted of the AMS inspecting each work zone as well as behind critical barriers where asbestos abatement was completed to confirm the abatement of all ACM suspect dust and debris. If suspect dust and debris ACMs were identified during the final inspection, the GAC was notified and shown the areas that needed to be abated again. The areas identified by the CDPHE AMS in each asbestos abatement zone as having suspect ACM dust and debris were abated until no more ACMs were found through re-inspection. After the AMS indicated the asbestos abatement work zone had passed the final visual inspection, the second phase of each final clearance set took place. This included a final clearance air monitoring and sampling analysis.

Final clearance air monitoring consisted of the AMS collecting five air samples in each asbestos abatement work zone to monitor for asbestos fibers in the air. Final clearance air sampling adhered to the method specified in Appendix A of EPA 40CFR763, Subpart E (EPA 1995). Sampling was performed under aggressive conditions by using leaf blowers and floor fans to dislodge any remaining dust present. Floor fans and leaf blowers were not directed toward known friable ACMs remaining in the asbestos abatement work zone.

The AMS collected the air samples using 25-millimeter (mm) diameter Mixed Cellulose Ester (MCE) filters with a pore size of 0.45 micrometers (μm), which were analyzed by phase contrast microscopy (PCM). These filters were housed in a three-piece cassette with a 50-mm electrically conductive extension cowl containing a filter back-up pad. Flow rates were set between 1 and 10 liters per minute with resultant sample volumes of 1,199 and 3,800 liters.

The CR8 regulation requires the collection of five air samples to clear each asbestos abatement work zone. An asbestos abatement work zone passed final clearance when the average of the analyzed samples was less than 70 structures per square millimeter (s/mm^2) or the fiber concentration for each of the five samples was less than or equal to 0.01 f/cc.

4.0 DISCUSSION OF FINAL CLEARANCE SET RESULTS

Details of each final clearance set that were performed along with air sampling analytical results for each final clearance set are presented in the KEH Final Clearance Set Reports in Appendix A.

5.0 REFERENCES

Environmental Restoration, LLC (ER). 2013. CDPHE Asbestos/Demolition Notification and Permit Modification Form.

Koch Environmental Health (KEH). 2011. "Asbestos Abatement Project Design". Eaton Sugar Beet Factory. May 28, 2011

U.S. Environmental Protection Agency (EPA). 1995. "Asbestos/NESHAP Regulated Asbestos Containing Materials Guidance" 40 C.F.R Part 763, Appendix A to Subpart E.

URS Operating Services, Inc. (UOS). 1999. "Emergency Response Program Generic Quality Assurance Project Plan" for the Superfund Technical Assessment and Response Team, Region 8. March 11, 1999.

URS Operating Services, Inc. (UOS). 2005. "Technical Standard Operating Procedures for the Superfund Technical Assessment and Response Team (START), EPA Region 8." September 2005.

URS Operating Services, Inc. (UOS). 2010. "Phase II Analytical Results Report" Eaton Sugar Beet Factory, Targeted Brownfields Assessment (TBA). October 19, 2010

URS Operating Services, Inc. (UOS). 2011. "Field Sampling and Air Monitoring Plan for Site Removal Action for Eaton Sugar Beet Factory Site. June 1, 2011

Appendix A

(see attached CD)